MEMO ENDORSED

January 9, 2018

BY CM/ECF

Honorable P. Kevin Castel United States District Judge Daniel Patrick Moynihan United States Courthouse 500 Pearl St. New York, NY 10007-1312

Intral conference

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30 to

WILMERHALE

Christopher R. Noyes

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11:30 am,

150 0 RDENTO, USOJ 1-19-18

Re: De Dandrade et al. v. United States Department of Homeland Security et al., Civil Action No. 1:17-cv-09604-PKC

Dear Judge Castel,

I write on behalf of all Plaintiffs in the above-captioned case.

Pursuant to the Court's Order dated December 27, 2017 (D.I. 24), the Initial Pretrial Conference in this case is scheduled for January 30, 2018, and the parties were directed to submit a joint letter five business days prior to the conference, *i.e.*, by January 23, 2018. In accordance with the Court's December 27 Order, Plaintiffs sent a copy of the Court's Order to all Defendants by FedEx Priority Overnight delivery on Friday, December 29, 2017. See D.I. 24 at ¶ 2. To date, Plaintiffs have not yet been contacted by Defendants and counsel for Defendants have not appeared. Counsel for Defendants must file a Notice of Appearance by January 30, 2018 (D.I. 24 at ¶ 3), and Defendants' Answer is due no later than February 26, 2018.

To provide Defendants an opportunity to appear, answer the complaint, and to meet and confer on the joint letter and Case Management Plan, Plaintiffs respectfully request adjournment of the Initial Pretrial Conference until at least March 12, 2018, which is fourteen days after the deadline for Defendants' Answer, consistent with Paragraph 1B of the Court's Individual Practices.

No previous requests for adjournment or extension of time of these deadlines have been requested. Defendants have not appeared in the case and therefore have not consented to this request. The requested adjournment does not affect any other scheduled dates.

Very truly yours,

USDC SDNY
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BY CM/ECF Page 2

/s/ Christopher R. Noyes
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